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11 VIOLET BLUE

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 VIOLET BLUE, an Individual,
12 Plaintiff and counter-
13 defendant,

14 v.

15 ADA MAE JOHNSON a/k/a ADA
16 WOFFINDEN, an individual d/b/a
17 VIOLET BLUE a/k/a VIOLET a/k/a
18 VIOLET LUST, et al.,

19 Defendants and
20 counterclaimants.

Case No. C 07-5370 SI

**DECLARATION OF CAROL QUEEN IN
SUPPORT OF PLAINTIFF BLUE'S
MOTION FOR PRELIMINARY
INJUNCTION**

Hon. Judge Illston
Courtroom 10, 19th Floor
450 Golden Gate Avenue
San Francisco, CA 94102

Hearing Date: May 9, 2008
Hearing Time: 9:00 a.m.

28 Case No. C 07-5370 SI

DECLARATION OF CAROL QUEEN ISO PLF BLUE'S MOT. FOR PRELIMINARY INJUNCTION

1 I, Carol Queen, declare as follows:

2 1. My name is Carol Queen. I am a third party to this litigation. I have personal
3 knowledge of the facts in this declaration unless otherwise stated, and could and would
4 competently testify to them if called as a witness.

5 2. I am a Ph.D. in sexology, a writer and educator, and the Staff Sexologist at Good
6 Vibrations. Good Vibrations is a sex toy retailer that operates retail stores in San Francisco,
7 California, and Boston, Massachusetts, as well as a mail-order business, and an on-line product
8 sales website. I have been working at Good Vibrations since 1990, where I began as a sales
9 associate. In approximately 1991, I initiated the development of Good Vibration's sex education
10 training program. I am also the co-founder and director of the Center for Sex and Culture, a sex
11 education and resource center in San Francisco. I am also a writer, speaker and advocate in the
12 fields of sex education and sex-positive culture. A webpage available at the on-line, at the user
13 edited encyclopedia wikipedia.org (http://en.wikipedia.org/wiki/Carol_Queen), describes other
14 details of my background.

15 3. In fall of 1998, Violet Blue was hired by Good Vibrations as a Sex Educator Sales
16 Associate (or "SESA" for short). She was hired to work in the Good Vibrations retail store
17 located at Valencia Street in San Francisco, California. At that time, in fall 1998, my role at
18 Good Vibrations was as the Continuing Education Coordinator, though I was in the process of
19 transitioning into my current role as Staff Sexologist. I was one of the Good Vibrations staff
20 members who trained Ms. Blue in the form of sex education that we use at Good Vibrations. The
21 training covered the sex-positive perspective, sexual diversity, sexual anatomy and function, and
22 information about the products sold at Good Vibrations.

23 4. Ms. Blue clearly already had knowledge about sexuality when she began working
24 at Good Vibrations in 1998. I recall that she was easy to train into a comfortable communicator
25 in the way Good Vibrations needed those staff members able to answer questions. I also recall
26 that Ms. Blue very rapidly began to have her own administrative functions at Good Vibrations.
27 She quickly began writing catalog copy and web magazine copy. She also began to be central to
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1 the inventory department, in that she was helping to select and write copy about the erotic films
2 that Good Vibrations carried. In addition, her SESA responsibilities put her in daily contact with
3 customers, which allowed her to develop her own writing projects informed by a sense of
4 understanding of what the customers might want in a sex education book.

5 5. The film-reviewing role Ms. Blue maintained at Good Vibrations, in particular,
6 was high profile in the adult industry. Good Vibrations began selling erotic films in
7 approximately the late 1980s. Over the years, the adult industry watched Good Vibrations as an
8 important testing zone, if you will, for how women were enjoying and purchasing erotic films.
9 By the time Ms. Blue began reviewing films for Good Vibrations (in approximately early 1999),
10 the porn industry in general was very interested in how Good Vibrations chose to sell and market
11 films to women. Ms. Blue's position gave her a real and immediate opportunity to have her work
12 received broadly in the larger adult industry.

13 6. At the time Ms. Blue was hired at Good Vibrations, I was also familiar with her
14 work at the Survival Research Labs ("SRL"). This work was of particular interest to me because
15 SRL is a well-known, alternative technology and art community. I knew that Ms. Blue was
16 known broadly in the tech community for her unique role as a woman interested in technology,
17 and it was clear to me that the work she did at SRL gave her one of her earliest platforms for
18 promoting herself and her brand online. I also saw her as having a distinct gift, ability and
19 presence, which was instrumental in her combining the worlds of sex and technology.

20 7. In my view, as someone who trained her at Good Vibrations and has watched her
21 develop her career over many years, Ms. Blue's brand and her fame were in full swing before the
22 middle of 2000. This is acknowledged through her work at SRL and Good Vibrations, and her
23 ability to extend that to the on-line context very quickly. I saw her very mindfully using the
24 communications mode that the internet was becoming. I am certain that by end of the 1990s she
25 was very much on top of that developing communication form. She had become one of the early
26 people I looked to in order to understand where sex on the internet was going. Indeed, through
27 writing for websites like gothic.net, necromantic.com, and for the www.goodvibes.com website,
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1 Ms. Blue had achieved a level of notoriety that was obvious to me.

2 8. I remember when Ms. Blue was negotiating her first book deal in 2000. At that
3 time she was already a known quantity and brand. Her writings on the internet were well-
4 established. I recall that when she first began working with a publishing company about her first
5 book, my impression, based on my own experience working with publishers, was that the
6 publisher understood her notoriety because it would have been quite unusual to offer a first book
7 deal if she did not have a platform in place to make it successful. Because Ms. Blue already had
8 a strong on-line presence through her SRL work, her work at Good Vibrations, and her many
9 other on-line efforts, her ability to get the book out there would be far greater than someone who
10 had never written a book before. I also understand and recall that shortly after her first book deal
11 was signed, but before that book was even released, the same publisher contracted with Ms. Blue
12 for a second, multi-book deal. From my experiences working with publishers, this was highly
13 unusual and would not have been done if the publisher did not perceive Ms. Blue's fame and
14 notoriety right away.

15 I declare under penalty of perjury under the laws of the State of California that the
16 foregoing is true and correct. Executed this __th day of April, 2008, at San Francisco,
17 California.

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20 Carol Queen